

ZMO LAW PLLC

April 9, 2021

Via ECF

MEMO ENDORSED

Hon. Sidney H. Stein
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

RE: *U.S. v. Joseph DePaola*, 19 Cr. 833

Dear Judge Stein:

This office represents Joseph DePaola in the above-captioned matter. We write, on consent of the government, to request a 60-day adjournment of the April 26, 2021 sentencing to June 25, 2021 or any day thereafter convenient to the Court. We request a longer adjournment to accommodate Mr. Margulis-Ohnuma's trial scheduled to begin May 3, 2021 in the Eastern District of New York. *See U.S. v. Aleksandr Zhukov*, 18. Cr. 633 (EDNY). The trial is expected to last approximately four to five weeks.

Mr. DePaola pleaded guilty in the instant case on February 2, 2021. After reviewing the Presentence Investigation Report ("PSR") with our client, we have determined that there are additional documents that we need to obtain to properly advocate for Mr. DePaola at sentencing. Moreover, the COVID-19 pandemic continues to limit the number of in-person proceedings, and Mr. DePaola prefers that his sentencing be conducted in-person.

Mr. DePaola accepted responsibility for his actions quickly and was one of the first defendants in his case to plead guilty. He has been perfectly compliant with the conditions of release, is gainfully employed, and continues to attend necessary treatment programming. Given the foregoing, I respectfully request that the April 26, 2021 sentencing be adjourned to June 25, 2021 or any day thereafter convenient to the Court.

Thank you for your attention to this case.

Very truly yours,

Victoria Nicole Medley


Victoria Nicole Medley

CC: Kiersten A. Fletcher (via ECF and email)

The sentencing will be held on June 25, 2021, at 9:30 a.m., at the U.S. Courthouse, Courtroom 23A. The defendant's sentencing submissions are due by June 11, the government's submissions are due by June 18.

**Dated: New York, New York
April 9, 2021**

SO ORDERED:



Sidney H. Stein, U.S.D.J.